

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In Re:

GEORGE S. BEVINS, JR. aka
GEORGE S. BEVINS Debtor

**OBJECTION TO
CONFIRMATION**

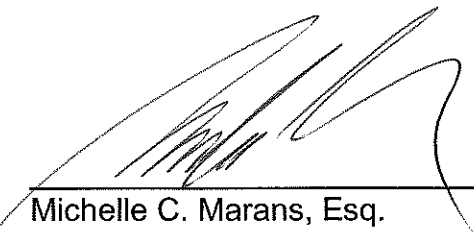
Chapter 13
Case No. 10-12856-REL

Michelle C. Marans, Esq., an attorney duly licensed to practice law in the State of New York and admitted in the Northern District of New York, affirms the following to be true, under penalty of perjury:

1. I am an associate with the firm of Steven J. Baum, P.C., attorneys for the Secured Creditor, GMAC Mortgage, LLC as servicer for Deutsche Bank Trust Company Americas as Trustee for RALI 2006QS18 ("GMAC Mortgage, LLC").
2. This Affirmation is submitted for the purpose of objecting to confirmation of the Chapter 13 Plan proposed by George S. Bevins, Jr. (the "Debtor").
3. The Debtor's proposed Plan provides for payment of pre-petition arrears in the amount of \$11,875.81. However, the Proof of Claim filed on behalf of GMAC Mortgage, LLC asserts pre-petition arrears in the amount of \$18,964.93. A copy of said Proof of Claim is attached hereto as Exhibit 'A'. Accordingly, Debtor's proposed plan lists incorrect pre-petition arrears.
4. Moreover, the Debtor's proposed Plan provides for total plan payments in the amount of \$17,488.20, which falls short of full payment of Debtor's pre-petition arrears to GMAC Mortgage, LLC. Accordingly, Debtor's proposed plan is not feasible.

5. By virtue of the foregoing, confirmation of the Debtor's proposed Chapter 13 Plan must be denied pursuant to 11 U.S.C. §1325.

Dated: Buffalo, New York
August 31, 2010



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